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By Fax and First Class Mail

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Re: SimPort Litigation

Dear Counsel:

In follow-up to our telephone conversation of yesterday, we have reconfirmed with our client the status of Western's production of the SimPort 2000 source code.

Western's production of the CD entitled "SeaBrook" is the SimPort 2000 source code as it existed immediately prior to being customized for the SeaBrook simulator. (Contrary to my understanding as conveyed in our conversation yesterday, the CD does not contain the simulator itself.) This is the earliest version of the SimPort 2000 code in Western's possession; i.e., Western did not preserve any "draft" code from the development.

Western will inquire once more of the primary programmer of SimPort 2000 – who is currently traveling outside the country, but due back next week – to determine if he maintained any earlier iterations or portions of the software. If he retained anything, Western will produce that as well.

Western's production of the CD entitled "GE" is the most recent version of the SimPort 2000 source code, and represents the version that was used

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to build the GE simulator. As with the SeaBrook CD, Western produced the source code only, not the simulator.

As we explained in our Motion to Compel, and in our conversation of yesterday, the interim versions of the SimPort source code from each project are substantially the same as the source code in this first and last version, as your expert will be able to confirm by comparing the two versions.

Sincerely,


Margaret A. Keeley